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August 22, 2024

**Via ECF**

Honorable Arun Subramanian  
United States District Court, SDNY  
500 Pearl Street, Courtroom 15A  
New York, NY 10007

Re: Steven Milazzo v. Bank of New York Mellon, Case No. 23-cv-5437 (AS)

Dear Judge Subramanian:

We represent Plaintiff Steven Milazzo in the above-referenced action. We write, with the consent of counsel for Defendant Bank of New York Mellon (“BNY”), to respectfully request an adjournment of the August 29, 2024 conference scheduled by the Court yesterday. There have been no previous requests for an adjournment of this conference.

The reason for the requested adjournment is that the undersigned, who is the partner at our firm in charge of this matter and will serve as lead trial counsel, is traveling on August 29 and 30 for a previously planned vacation. I have conferred with Defendant’s counsel, and counsel for both parties are available for a rescheduled conference on September 4, 5, 10, 11, or 12 if those days are convenient for the Court. As noted, Defendant’s counsel consents to this requested adjournment.

The date of the parties’ next scheduled appearance before the Court is the August 29 conference. Per the Court’s Individual Rule E, the following deadlines exist (including deadlines set prior to reassignment to Your Honor):

<u>August 23:</u>	Deadline to submit joint status letter, per the Court’s August 21 Order;
<u>August 30:</u>	Deadline for Plaintiff to serve expert report (with Plaintiff’s expert to be deposed at an agreed-upon date in September) and deadline for Defendant to file its opposition to Plaintiff’s Motion for Leave to File a Second Amended Complaint Asserting Additional Retaliation Claims (ECF Docs. 64-66);
<u>September 19:</u>	Deadline for Plaintiff to file his reply brief in further support of his motion;
<u>September 27:</u>	Deadline for Defendant to serve its expert rebuttal report;
<u>October 18:</u>	Deadline for Plaintiff to depose Defendant’s expert and end date for expert discovery.

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This request for an adjournment of the August 29 conference will not affect any other deadlines in the case. However, Plaintiff's counsel has alerted Defendant's counsel to a confidential, personal matter that will require extensions of the September 27 and October 18 deadlines above, among other discovery deadlines that may arise depending on the Court's resolution of pending motions. Counsel will meet and confer on these matters prior to the scheduled conference, and Plaintiff's counsel respectfully requests that he be permitted to provide the reason for any requested extension to the Court *in camera* at the conference.

Thank you for the Court's consideration of this submission.

Respectfully submitted,

/s/ M. Todd Parker

M. Todd Parker

cc: All Counsel via ECF

The request for an adjournment of the conference is GRANTED. The conference will take place on Wednesday, September 4, 2024, at 2 PM.

SO ORDERED.



Arun Subramanian, U.S.D.J.

Dated: August 23, 2024